

Organization

Comment on Ecosystem - 1996

Hydrologic Consultants, INC

reducing land subsidence will profit benefit for aquatic habitat, wetland and species population

Use of multiple hatcheries for fall run on San Joaquin is inconsistent with the modern management of wild stocks and is not recommended in any other restoration document.

The use of bypass of Mouth of Old River in place of a barrier, to facilitate salmon passage is unlikely to have the anticipated results as described at the recent meeting.

Construction of a barrier at delta cross channel is proposed in several alternatives. Is something other than present system of radials gates intended.

Marking of salmon is presented as tool for managing ocean harvest rates. The AFRP does not make this recommendation largely because studies in northwest indicate that mortality rates are unacceptable high among the unmarked(or illegally sized) salmon.

ALT1: It proposes that changes in export pattern will achieve moderate increase in delta outflows. The mechanisms for such results are unclear.

ALT2: This and some other propose to reduce fish entrainment at the export facilities through implementation of a real time program on salvage.

Such a program is already in place with samples taken every two hours. Is some other action intended.

Questions arise to the sustainability of the deepening the San Joaquin channel. Would this be a constant dredging project or a self sustaining project.

In ALT15 the restoration actions on San Joaquin should be described together rather than in different places. There should be more alternatives which include long term staged features. The San Joaquin alternative are too limited if the objective is to provide much increased survival of salmon rearing in the SJ tributaries, passing through the delta or restore native fish populations.

Hydrology and Water Resources Planning

Stream Restoration should include removal of Englbright Dam on the Yuba River, which would open up significant spawning and rearing habits for spring-run chinook salmon and steelhead.

Calfed should consider releases from the Friant Dam that would be intended to provide habitat for the native freshwater fishes rather than anadromous fishes in the San Joaquin River upstream from the confluence with the Merced.

Environmental Water Caucus

All Alternatives should contain comprehensive ecosystem restoration and efficient water management programs, range of particular water supply option to improve reliability and predictability be included for further analysis in the alternative; and that key institutional, legal, and/or design elements to assure implementation be addressed.

Contra Costa County Water Agency

Twenty draft alternative solutions don't represent reasonable approaches to these problems. No justifications for moving the state and federal water project diversion points out of the delta. A common pool Ensures a balanced distribution. System Reoperation alternatives, we believe that a more detailed description of each alternative is required to effectively evaluate them. Core actions component of the alternative be expanded to guarantee extensive habitat restoration, levee stabilization and demand reduction as these tasks.

Process more thoroughly consider the sources of water toxicity, particularly from agricultural drainage.

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Delta Wetlands

Following items should be deleted from the alternatives analysis, but included in an overall balanced package.

Water Supply:

- a. Reduce Demand
- b. Conjunctive Use/ Groundwater Banking.
- c. Water Transfer.

Water Quality:

- a. Pollutant Source Control.

Ecosystem Quality:

- a. Bay Delta Habitat Restoration.
- b. San Joaquin River Improvements.
- c. Upper Sacramento Restoration.
- d. Obtain Water for Environment.
- e. Store water for Environment.
- f. Screen Diversions

System Vulnerability:

seperate analysis of the core actions from the major alternatives, an another analysis should include a measure of yield based on the State Water Resources Control Borad's 1995 Water Quality Plan.

We believe that the four operable barriers that need to be installed in the south Delta should move forward as a no project alternative at the earliest possible date.

Shasta Tehema Bioregional
Council

It is critical that CALFED's alternative be broadened to include management, conversation and restoration on the watersheds in the area of origin. Water must be regarded as a producer with three dimensions quantity, quality, time. None of these critical issues has been addressed in the CALFED document except in the very narrow context of the estuary itself. The cost and benefit of maintaining healthy watersheds have been ignored in your process and are tremendously underestimated in the great water debate.

Direct control technique for prevention and control of potential wildfire damage is critical to long term watershed management. This means making a forest healthy and vigorous by silvicultural, management, and sanitation measures. These issues also have all but ignored in the CALFED documents.

Central Valley Habitat Joint
Venture

Wetland restoration efforts upstream of the Delta appears to lack emphasis north of the Delta on wetland restoration and restoration efforts. it it unclear how restoration is being integrated into the alternatives or what role wetland restoration can play in assisting with the flood control and ground water recharge efforts north of the delta.

Alt designed to provide water storage should and properly mitigate for the impact the project may have on migrating waterfowl. Restoration of managed seasonal wetland habitat be equally integrated into the ecosystem solution package.

Central Valley Habitat Joint
Vnture

Protect and enhance existing Wetland needs to be clarified to include tidal and non-tidal wetland. The core action does not refer to restoration of habitat.

Shasta County Water Agency

Sixteen of the twenty alts ignore the Sac Valley's place in the ecosystem. Without restoration projects in the upper watersheds, further degradation of the fisheries and associated listings of salmonid runs is inevitable.
All of the decent water that goes through the delta comes from the Sac River valley along with most of the fish. CALFED's early document recognized the importance of working with the Areas of origin. We are disappointed to see the apparent loss of this broader vision in the implementation.

There has been decades of fire suppression and forest/ shrub build up. The large resulting fires devastate the resources of a watershed, adversely affecting fisheries and water quality. These upland issues are not addressed in any of the Draft Alt's.

California Urban Water Agencies

"The objective to reduce the uncertainty of Bay-Delta system water supplies to meet short and long term needs" could be interpreted such that a reduced but more certain water supply from the Bay Delta system would satisfy this objective.

We believe that a comprehensive ecosystem restoration program is critical to a successful alt and are concerned that the wide variety of approaches and levels of implementation which appears in the twenty alt connote that there is a great deal more known about what sets of actions should be undertaken and what biological benefits will result than is justified by the current scientific understanding of the system's problem and results of restoration actions.

In general Core Actions defined in the workshop lack specificity.

We believe that each alt should contain a comprehensive ecosystem restoration program as noted in Stakeholder submittal and that alt do not need to vary in degree on this component.

Department of Water Resources (DWR)

To better reflect the restoration potential and the biological value of the upper Sacramento River, I would suggest revising both the core actions and the alternatives to include a basic, moderate, and high level of restoration.

To develop the specific actions it would be best if CALFED staff could sit down with representative from SB 1086 Riparian Committee. Diane Jacobs is the Chair of the Riparian Committee.

Environmental Water Caucus

The CALFED program has not articulated specific objective for protection and restoration of ecosystem quality.

The CALFED program core actions do not adequately capture many essential elements common to all alternative which are necessary to the success of a long-term Bay-Delta solution.

The scale of Bay Delta ecosystem restoration actions needs to be more ambitious.

Alternative that retain the common Delta pool should continue to be emphasized.

Any alternative that would seriously alter Delta inflow and outflow, or otherwise degrade existing habitat, should be eliminated from further consideration.

In-Delta water storage for environmental purpose and South Delta barriers should not be treated as essential elements of the alternative, but as alt approaches in themselves.

We agree with the concept of core actions for delta ecological restoration. It does not appear workable to consider this as a separate alt. The proposal for level of low, moderate and extensive ecological restoration should be discarded. Core actions should be formulated with a number of feature as now described in many of the alt.

It is unlikely that fish and wildlife agencies would accept "low" or "moderate" levels of the ecosystem restoration when a "high" level is on table. Our agency will not accept mandated demand management as part of any CALFED program nor will we accept taking ag land out of production as a method of reducing demands for delta water. Water users have already agreed to reduce water diversions from the delta and it will be inappropriate to expect further reductions in Delta export on the part of these water users.

Alt now formulated now do not give adequate consideration to meeting short or long term water supply needs.

CALFEDS core actions focusing on Increasing Water Supply Predictability is not accepted to agency because such a core action could be more misconstrued to mean that less water more often is acceptable to the water users. That is not so. The water users must have their water supplies increased, as opposed to made more predictable.

We would object to a state policy that establishes water transfers as a primary method of increasing the water supply for one set of water users by reducing the supply related economy of another set of users.

It seems more appropriate to say that Alt 2 is more like a core action rather than alt. We further support evaluation of CUWA findings.

Alt 3:

There are unknowns and questions about the affordability and physical feasibility of large siphons under the Sacramento River and through the Central Delta.

Alt8:

The stakeholder have prepared an alt similar to this that should be given further consideration.

Alt10:

This meets the test but may not be implemented without consideration of water quality flows in Central Delta.

Alt12

this may overcome deficiency of alt 10.

Alt16:

More examination of affordability and implementability may show it to be impractical.

Alt 11:

stakeholder have prepared a similar alt submitted in their comments on feb 15.

Agency agree with CUWA that none of the system reoperation alt are acceptable because they fail to meet the water users needs or CALFED's solution principles, especially regarding durability and reduction of impacts. The agency hopes that the concept of "pay for what you get" is woven into your program, including core actions. With the rising costs of SWP water and its diminishing availability, we cannot afford additional costs for a delta solution without getting more water.

The draft does not treat operating standards satisfactorily. limits discussion of the subject to proposing review of export/inflow ratios during triennial reviews. Scope nor the setting is appropriate. Alternatives report should focus on the goal of the program concerning operating standards. Alternatives report needs to set the stage by describing the concept.

2. Wetland Habitat Restoration - Balanced improvements in each are needed. Draft needs to be more specific as to the fishery benefits expected and the evidence or hypotheses supporting those benefits.

3. In-Delta Storage - Concept may not warrant that degree of inclusion. Relative benefits and cost of the two need further evaluation.

4. Subsidence Management - It should be included in more alternatives.

5. Common Actions - Addition to having a set of Core Actions for early implementation that there be a set of actions common to all alternatives. Common Actions section is including all or most actions of secondary importance to the program in Common Actions.

6. Linkages to the Anadromous Fish Restoration Program - opportunities should be sought for describing the linkages between the two programs.

7. As the alternatives now stand, very little will be done for the San Joaquin system. Seek a more balanced approach.

8. Development of local water supplies which could reduce demands on supplies from the Delta.

Wheeler Ridge-Maricopa
Water Storage District

We find little in the alt to indicate any increase in water supply being a significant purpose of the program. Before any decisions are made we need to have information on costs, allocation of costs among beneficiaries and repayment must be developed. What exactly does Delta Ecosystem Restoration means. And can this be rather changed to ecosystem management so the goals are little more realistic.

Pacific Coast Federation of
Fishermans Association

Be more clear, when you say that CALFED will incorporate fish plans and habitat concerns that are part of the CVPIA and also of California Fish and Game. Does CALFED agrees with the salmon doubling plan which is mandated by CVPIA.

Environmental Defense Fund

Restoration targets should constitute current understanding of what "biological bottom line" is -- the min that should be done to achieve ecosystem restoration goals. The targets should be met by all alternatives

Consulting Engineer

Core actions should be given three columns of Activities, Objectives, Benefits. A better concept would be to have essential actions formulated as the initial set of core actions to be implemented in stage I. Base the structure of the alt on four solutions for delta water flow and aquatic habitat conditions ie to fix the delta

1. Through delta
2. Large eastside Conveyance
3. Dual Conveyance
4. No Action

Each of these should be combined with balanced approach actions to meet major objectives such as New storage, Ecosystem restoration, demand management, water supply improvement, levee system vulnerability.

Program work towards some vision for ecosystem management with understanding that vision may be modified by adaptive management process. Program should have assured funding. Program coordinate or merge with existing program. Ecosystem should be developed by interested parties under CALFED. There should be Ag Demand management and Urban Management Program. Program should be developed by water users under CALFED. Levee improvement and maintenance be part of every alt. Ecosystem, demand management, levee program be elevated to special status in CALFED. Flexibility to accommodate changing environment be prime criteria for every water supply alt. Storage should be regarded as something that could be added on to any Delta water supply alt to make it more flexible in accommodating future env conditions. Alt should be divided into three basic alt

1. Essentially no water supply facilities.
2. Through alt
3. Dual isolated facility.

The Metropolitan Water
District of Southern California

All these are possible concerns on different aspects and objectives:

Inadequate water supply, quality benefits. Limited transfer options. Continued fish entrainment, site specific impacts of storage, cost of new storage. Reduced export water quality, export flexibility, ecosystem water quality, high infrastructure costs. Levee fish entrainment

Delta Protection Commission

Wildlife's habitat to adverse impacts to adjoining ag lands.

Delta Protection Commission

Study overall management of Delta. Study carrying capacity of the delta waterways for recreation activities without degradation of habitat values. Process should consider and incorporate land use policies in commission's adopted plan in alt.